

**Before the
FEDERAL COMMUNICATIONS COMMISSION
*Washington, D.C. 20554***

In the Matter of)	
)	
ITA Informal Request for Certification)	
To Coordinate the Power Radio Service,)	
Railroad Radio Service,)	RM-10687
And Automobile Emergency Radio Service)	
Under Part 90 of the Commission's Rules)	
)	

**COMMENTS OF THE
INDUSTRIAL TELECOMMUNICATIONS ASSOCIATION, INC.**

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Summary

ITA urges the Commission to permit competitive coordination on power, railroad and automobile emergency channels below 512 MHz. ITA is capable and qualified to perform frequency coordination for these service pools, and we stand prepared to support these eligibility groups in frequency coordination services below 512 MHz, as we have done for over 17 years in the 800 and 900 MHz bands and for 50 years on traditional private land mobile channels. ITA would continue to coordinate these entities following sound engineering practices while affording each service-specific incumbent special consideration, as ITA has been doing on behalf of the American Petroleum Institute for over 15 years.

ITA currently coordinates hundreds of licenses each year for power, railroad, and automobile emergency eligibles in all private land mobile radio bands, making ITA, therefore, representative of the users in these services. Unfortunately, many of ITA's members and clients abstained from public comment in support of ITA's request based on misinformation and political pressures associated with membership in other associations.

Nevertheless, ITA has and continues to fully support the interests of the private land mobile community. ITA's mission continues to be the procurement and protection of the private land mobile community, including all private land mobile licensees.

With the implementation of the Universal Licensing System, information sharing between frequency coordinators has become effortless. ULS permits coordinators access to accurate, up-to-date information and has become an effective tool for the facilitation of competitive coordination. Moreover, since daily notification is already a part of a coordinator's routine, concerned coordinators will have ample time to comment on a certification in these pools.

The public interest would be served by the Commission certifying ITA as a frequency coordinator for the power, railroad and automobile emergency services. The benefits of competitive coordination are increased efficiency, decreased costs, less coordination time, and innovative new ways of meeting customer demand which should be offered to power, railroad, and automobile emergency applicants. With adequate information on the record supporting ITA's representativeness of the users of the services in question and years of experience coordinating these eligibles, the Commission should act in the "public interest" and grant ITA's *Request*.